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June 11, 2012

Via Facsimile

The Honorable Cathy L. Waldor, U.S.M.J.
Martin Luther King, Jr. Federal Building
50 Walnut Street, Room 4C
Newark, New Jersey 07101

Re: **Hoffman v. Time Warner Cable Inc.**
2:12-cv-00978-ES-CLW

Dear Judge Waldor:

This firm represents defendant Time Warner Cable Inc. ("TWC") in the above matter. Per your request, this letter summarizes the schedule for class discovery proposed by the parties during the June 6, 2012 telephone conference with the Court.

The parties have agreed that written discovery relating to class issues will be served by each party by Friday, June 29, 2012. The parties will respond to the written discovery in accordance with the Federal Rules of Civil Procedure. If any issue arises regarding written class discovery, the parties will attempt to resolve their disagreement and, if unable to do so, will contact the court to resolve the issue. The parties will then proceed with depositions relating to class issues and conclude class discovery by Friday, October 12, 2012. The parties will then initiate a conference call with Your Honor on Wednesday, October 17, 2012, at 11:30 AM.

SO ordered
Cathy L. Waldor
JSM
6/13/12